

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**ALEXIA ADDOH-KONDI, CYNTHIA)
BONNER, JA’NELLE BROWN, ERIC)
HALL, MICHAEL HANSEN, JULIA)
JUAREZ, CHARLES LONG, WILLIAM)
MUHAMMAD, FRED LEE RANDAL,)
TAMMIE SMITH, and ROBERT)
WALKER,)
)
)
Plaintiffs,)
)
vs.) Case No: 2:23-cv-00503-MHH
)
JEFFERSON COUNTY COMMISSION,)
)
Defendant.)**

**ADDOH-KONDI PLAINTIFFS' NOTICE OF FILING
EVIDENTIARY MATERIALS IN SUPPORT OF THEIR
MOTION FOR SUMMARY JUDGMENT AND SUPPORTING BRIEF**

Plaintiffs Alexia Addoh-Kondi et alia, through undersigned counsel, give notice that they may rely on exhibits submitted by the McClure Plaintiffs, attached to Addoh-Kondi Doc. 89, to support the Addoh-Kondi Plaintiffs' motion for summary judgment and supporting brief to be filed hereafter. The Addoh-Kondi Plaintiffs will rely on the following additional exhibits attached to this notice:

Exhibit A. Emails dated September 8, 2023, responding to FOIA request

Exhibit B Jefferson County Commission Section 5 submission dated

November 18, 1985, including 1985 Consent Decree in *Taylor v. Jefferson County Comm'n*, No. CV 84-C-1730-S (N.D. Ala.)

Exhibit C Expert report of Anthony Fairfax dated March 15, 2024

Exhibit D Appendices to March 15, 2024, Fairfax expert report

Exhibit E Rebuttal expert report of Anthony Fairfax dated April 26, 2024

Exhibit F Appendix to April 26, 2024, Fairfax rebuttal expert report

Respectfully submitted this 5th day of June, 2024.

/s/ Richard P. Rouco

Richard Rouco
Quinn Connor Weaver
Davies & Rouco, LLP
2 - 20th Street North Ste. 930
Birmingham, AL 35203
Tel. (205) 870-9989
Fax. (205) 803-4143
rrouco@qcwdr.com

/s/ U. W. Clemon

U. W. Clemon
2001 Park Place
10th Floor
Birmingham, AL 35203
Tel. (205) 506-4524
uwclemo1@gmail.com

/s/ James Uriah Blacksher

James U. Blacksher
825 Linwood Road
Birmingham, AL 35222
Tel. (205) 612-3752

Fax. (205) 845-4395
jublacksher@gmail.com

/s/ Richard Rice
Richard Rice
The Rice Firm, LLC
115 Richard Arrington Jr. Blvd. N.
Birmingham AL 35203
Mailing - Post Office Box 453
Birmingham, AL 35201
Tel. (205) 618-8733 ext. 101
rrice@rice-lawfirm.com

Counsel for the Addoh-Kondi
Plaintiffs